



*Derek L. Hall*  
— *pho* —

ATTORNEYS AT LAW

February 4, 2014

**Via Electronic Mail**

P. Scott Phillips, Esq.  
Campbell DeLong, LLP  
sphillips@campbelldelongllp.com

**Re: Prince v. Washington County, et al. Discovery**

Scott:

This correspondence will follow our conversation of this morning. We are in receipt of your *Motion to Deem Requests for Admission Admitted*.

As I communicated to you this morning, no one in our office – attorneys and staff included – received any discovery from your office on the above referenced case. It is certainly not our policy to neglect to respond to discovery.

Upon conferring with co-counsel Michael Duncan, he informed us that he also does not have the referenced discovery documents.

This letter is certainly not intended to accuse or inflame, as I have considered you to be nothing but an extremely courteous and professional lawyer, but rather to resolve an issue currently existing between counsels opposite. We would, at bare minimum, prevail upon you that we will need to discuss the discovery requests with our client, and afterward, return them to you as soon as possible.

To that end, I would request that you please send a copy of the interrogatories, requests for production of documents and things, and obviously, the requests for admission, as well, to my email address listed below, preferably in a Word format.

Again, I do appreciate and understand your position, and do not intend to ask you to come off it, but would kindly request that we do attempt to resolve the issue as it exists at the present juncture to the best we can.

*phone* | 601.981.4450 *fax* | 601.981.4717 *email* | jeffrey@dlhattorneys.com

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Thank you in advance for your consideration. Please give us a call to discuss this matter if you wish.

Sincerely,

*Derek L. Hall, pte*

A handwritten signature in blue ink, appearing to read 'J. McGuire', with a stylized flourish at the end.

Jeffrey B. McGuire  
*Associate*

JBM:ms

Cc: Derek Hall, Esq.  
Michael Duncan, Esq.  
Michael Prince, Jr.